

2023 to 2026 Accessibility Plan

PURPOSES

At Northcrest Developments (the Organization), we strive to treat all people with respect and in a manner that allows them to maintain their dignity and independence. The Organization is firmly committed to meeting the obligations of the Accessible Canada Act (ACA) and the Accessibility for Ontarians with Disabilities Act (AODA) with respect to appropriate accommodation for persons with disabilities.

The purposes of this Accessibility Plan are to:

- Ensure that workplace accommodation requirements are determined on a case-by-case basis for Job Applicants and/or Employees with a Disability (all as defined below);
- Achieve a work environment that promotes dignity, integration and equal opportunity and is supportive of Job Applicants and Employees;
- Comply with all applicable legislation; and
- Establish an efficient process for supporting accessibility that is consistent with the principles of confidentiality and shared responsibility.

Accommodating Disability in the workplace is a shared responsibility that includes the Organization, Job Applicants and Employees, along with any other relevant parties as needed (e.g., consultants, contractors, etc.).

This Accessibility Plan will include information on the identification and removal of barriers, and the prevention of new barriers, in the areas described in Section 5 of the ACA, which are:

- Employment
- The built environment
- Information and communication technologies (ICT)
- Communication, other than ICT
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation

DEFINITIONS

Barrier is defined by the ACA as anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

Disability(ies), as defined in the ACA means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society

GENERAL

- Feedback

Christopher Eby, Executive Vice President, Corporate & Public Affairs, is responsible for receiving feedback on behalf of the Organization. Christopher Eby can be contacted at: info@northcrestdev.ca or 437-912-9333

Or through our contact form at www.northcrestdev.com/#contact

Please contact Christopher Eby, Executive Vice President, Corporate & Public Affairs for any information regarding the Organization's Accessibility Plan, including:

- A copy of the Accessibility Plan in an alternate format; and
- To provide feedback to the Organization.
- Executive Summary of Accessibility Plan

Northcrest Developments is committed to maintaining and improving our accessibility standards and accommodations. We have identified and acknowledged existing barriers that exist throughout the employee lifecycle, within the physical work environment, related to technology, and within marketing, communications, and events. We have conducted a thorough gap analysis and audit related to the work experience of our employees and employee lifecycle, and have worked to build accessibility in as a priority from the beginning. Existing goals include supporting accessibility and accommodations through recruitment, onboarding, and the entirety of the employee experience, maintaining an accessible and inclusive work environment, maintaining high accessibility standards

within marketing, communications, and events, and working with our partners and vendors to further support accessibility.

AREAS OF FOCUS

- Employment

Identified barriers:

Recruitment

- Working with recruiters and recruitment firms that maintain accessible practices and support inclusive hiring practices

Onboarding and Training

- Programming that is tailored for persons with disabilities
- Barriers to retention

Accommodation Support

- Approval processes for accommodation requests
- Employment policies that detail information regarding accommodation
- Implementation of Accommodation requests

Actions to be taken:

Future State	Target Implementation date
• Continuing to work with recruiters and recruitment firms that center accessibility for job applicants and candidates	Underway, ongoing
• Simplified request/approval processes ensuring both easier access to accommodations while protecting the psychological safety and dignity of the employee making the request (this could be done in	Underway

partnership with an external consultant)	
To support accessibility throughout the employee lifecycle, work with a consultant to review aspects of the employee lifecycle including hiring, onboarding, performance management, psychological safety. Based on recommendations, establish priorities and timeline.	Began May 2022, underway, ongoing

- The built environment

Identified barriers:

Physical structures

- Identifying issues with building or office facilities
- Signage

Workspaces

- Spaces that can be easily tailored to accommodate persons with disabilities
- Spaces that take into account sound, ergonomics, and other spatial issues for persons with disabilities
- Support services offered

Emergency Measures

- Emergency procedures that do not create obstacles for persons with disabilities

	Future State	Target Implementation date
Workspaces	Perform regular workplace reviews to identify any gaps within the workspace	Ongoing

	• Invite employees to discuss specific needs regarding their own working station	Underway, ongoing as part of onboarding
	• Inform employees about ergonomic workspace options	Underway, ongoing as part of onboarding process
	• Inform onboarding automated task to get new employee physical/facility specific needs	July 25, 2023
	• Provide access to ergonomic equipment including Footrest, Desks, Chairs, Back support, Anti-reflective screen and technology equipment as needed and upon request	Underway, ongoing
Physical structures	• Inform employees of the process for any accessibility question related to the building	Underway, ongoing
Emergency measures	• Working with building owner to evaluate ways to include emergency measures for visual and hearing impairments	Ongoing

- Information and communication technologies (ICT)

Identified barriers:

- Limited offerings of software, tools and equipment to persons with disabilities
- Unknown level of internal and external WCAG 2.0 compliance, including applications provided by third parties

- Lack of resources for onboarding new employees with disabilities
- Limited internal expertise on accessibility

Future State	Target Implementation date
• Offer training to our employees and managers to ensure they are knowledgeable on accessibility issues including various accommodations tools, equipment and technology standards.	Ongoing, through onboarding – expand in 2024 to include additional role-specific training
• For new external systems: Include questions about WCAG in our procurement process, ask vendors to commit to a road map • For existing external systems : Remind vendors about our commitment to WCAG principles	Ongoing

- Communication, other than ICT

Identified barriers:

Multimedia

- WCAG 2.1 compliance
- Offering multimedia in accessible formats

Events

- Accessible signage, wayfinding, and collateral at all events.

Written Communications

- Writing styles and content presentation

	Future State	Target Implementation Date
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Written Communications	• Avoid jargon, complex language, syntax and acronyms without definition. • Simplify presentation of text and graphics • Make material available in languages other than English upon request • Color contrast for text and visual accessibility • Size of visual elements (typography, boxes, images, etc.) • Accessible typography • Provide, if necessary, a text transcription of the images	March 31, 2023
Multimedia and Events	Where possible, • Evaluate adding closed captioning and/or subtitles to multimedia. • Add descriptive text to all to digital images. • Provide audio or video transcription upon request • Provide sign language interpretation upon request • Make media available in languages other	June 30, 2023

	than English upon request • Sound control during events. • Color contrast for text and visual accessibility • Size of visual elements (typography, boxes, images, etc.) • Accessible typography • Provide, if necessary, a text transcription of the images • Accessibility of PDFs on the Northcrest's website • Overall WCAG 2.1 compliance for all owned digital entities	
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- The procurement of goods, services and facilities

Identified barriers:

- No specific set up for procurement of goods services and facilities
- Lack of discussions/ deals with vendors and suppliers that facilitate accessibility

Future State/Ways to Improve	Target Implementation date
• Remind vendors about our commitment to WCAG principles at each renewal • Integrate this in our discussions and in contracts renewal as well as for new suppliers	Ongoing

• Include clauses related to accessibility in new contracts, recognizing it's not the responsibility of Northcrest to apply nor operationalize the implementation of WCAG standards in apps/software	Long-term goal
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- The design and delivery of programs and services

Identified Barriers:

- Limited accessibility among program offerings
- Format and design of programs

Future State/Ways to Improve	Target Implementation date
• Offer a mix of programs/program options to accommodate a range of needs and to improve overall inclusivity of programming.	June 30, 2023

- Transportation

Identified barriers:

- Travel to external events
- Parking

Future State/Ways to Improve	Target Implementation date
• Provide or source employees with adaptive transportation to facilitate travel to events at locations outside of Northcrest's locations • We are committed to offering employees details about accessible entrance and offering parking to mobility reduced candidates when	Ongoing

coming in for an interview, or to offering technological alternatives. • Provide a process to allow for potential applicants to request accommodations for the interview process Explore the possibility of offering adapted transportation to facilitate travel to outdoor event locations and to Northcrest offices.	
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CONSULTATIONS

- Whom We Consulted

To support Northcrest Developments' ongoing commitment to Diversity, Equity, and Inclusion (DEI), Northcrest has engaged Bright + Early (B+E), an HR and DEI consulting firm. B+E's mandate has been to audit Northcrest Development's existing processes and policies to provide recommendations to align with DEI best practices, including accessibility for employees. Northcrest Developments and Bright + Early have consulted with each department and provided both survey and interview options to every team member, including those who benefit from accessibility measures to participate in the audit process. We recognize that the work of DEI and accessibility is ongoing and are committed to continue meeting with employees and employee groups to gather and implement feedback related to our accessibility and broader DEI initiatives.

- When Consultations Occurred

Northcrest Developments began consulting with employees in 2020 on DEI goals and initiatives, refining their goals and initiatives over one year. Following a RFP, Northcrest engaged Bright + Early in May 2022. They began consulting with employees, using both surveys and one-on-one interviews, which occurred simultaneously over a two month period. Departments and individuals who would benefit from accessibility measures continued to provide feedback through to December 2022 and have an open invitation to provide feedback at any time.

- How Consultations were Conducted

The consultation process included sharing all processes and policies with Bright + Early. We conducted a thorough gap analysis in each area identified by the Accessible Canada Act for audit purposes, as well as conducted an anonymous survey to all team members, including those who would benefit from accessibility measures , and open invitations for 1:1 interviews with all team members.

- Results of Consultations

Results gather from the consultation was presented to employees in the summer of 2022, and the outcomes related to accessibility have been included in this policy.

RESOURCES

Northcrest Developments will endeavor to provide reasonable accommodation and resources to employees with disabilities. Employees can submit requests for reasonable accommodation to their manager and/or to the Workplace Experience Manager. Northcrest then works cooperatively with employees and managers to determine whether reasonable accommodation is possible and to define such accommodation measures to be implemented. These accommodations requests will be considered for all appropriate work locations, such as in-office or at home.

TRAINING

Northcrest is committed to breaking biases and creating a safe, equitable and accessible workplace for people living with all forms of disabilities, whether physical or mental, visible or invisible. As such, we provide training that is consistent with our Accessibility Policy and this Accessibility Plan. Training will be provided to all members of our Organization, including employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

This training will be provided as soon as reasonably practicable after staff commence their duties. The content and delivery of training may vary in accordance with the trainees' duties and responsibility and will include the following:

- the purposes of the AODA and its requirements
- the Ontario Human Rights Code as it pertains to persons with disabilities
- how to interact, communicate and consult with people with various types of disabilities, including use of accessible communication formats

- how to accommodate individuals that require the assistance of a service animal or a support person
- how to provide, receive and escalate feedback provided with respect to accessibility questions and concerns
- our policies, practices and procedures relating to providing services to people with disabilities

The Organization will maintain a record of the training provided, including the training dates, and the name and number of individuals to whom it was provided. The details of this training, including the training log will be reported to the provincial government as part of our obligations under AODA

We may provide additional training as changes in legislation or workplace conditions require, or in relation to job-specific duties.